

Date: July 21, 2023

To: El Cerrito Planning Department

Re: Housing Element Second Revised Draft

I want to thank you for your hard work on the housing element. I know from collaboration with other cities, nonprofits, and housing advocates that this was a particularly challenging cycle, entailing consideration of numerous moving parts, new legislation, and higher stakes, all coupled with long-standing constraints and in the context of a regional housing crisis decades in the making.

I am glad to see more robust and accountable language in the second revised draft, particularly around:

- densifying neighborhoods
- explicit zoning amendments that align with equity, accessibility, and care-centered approaches to urban planning and civic life
- expanding and ensuring equal opportunity to resources and opportunities
- increasing shelter beds, housing, and services for persons experiencing homelessness
- disrupting patterns of concentrated racial affluence
- actively soliciting and prioritizing input from marginalized, vulnerable, and/or low-income community members
- highlighting and providing for missing middle housing
- developing measurable criteria and accountability standards
- reallocating the unit distribution of household income for the EC Plaza TOD to de-prioritize market rate housing and ensure more equitable housing access

I hope the City will uphold these values and commitments as it implements the plan in coming years and conducts evaluation of its success and obstacles.

I have the following additional comments:

- The sites for shelter/assistance for unhoused community members listed on page 2-30 are always at capacity and have restrictions that preclude all who need help from getting it. I noted that on page 7-9, the City committed to "increasing shelter beds and housing for persons experiencing homelessness by 30 beds." I also noted that the City stated that they would identify funding sources for this priority by July 2023. **I would like to know what sources have been identified at this point.** I'd also encourage the City to look into siting a low-barrier navigation center in the San Pablo Avenue Corridor; the resources and services offered at navigation centers are particularly important for individuals who experience homelessness on an episodic basis, a significant population, and one that is not sufficiently captured by the PIT count taken on a single night.
- Fifty-seven percent of the housing capacity identified in the revised element is located in areas where there is a higher proportion of African American and Asian residents *and* low/very/extremely low-income households. The RHNA splits slate far more units for median and higher-income earners, something I have commented on in the past, and which I know does not fall directly under El Cerrito's purview. I appreciate that developers are required to set aside between 10-12% of units for low- to moderate-income households or pay an in-lieu fee, but

there are stronger levers that can be implemented, and I hope they will be. Due to inflation, high interest rates, and other factors, the affordable housing market has a very bleak projection for the coming year(s). In-lieu fees are only beneficial insofar as there are projects (and available land to site them) to put them toward. I encourage the City to increase the number of units required for set-asides for lower-income households. Rents have risen astronomically over the past decade, and developers are assured of making their targets based on the demographics and earning capacities of many of El Cerrito's newer residents *even if they are required to provide more affordably-priced units in a given development*. In addition, even low- and moderate-income rents are not "affordable" to many of our community's most vulnerable and historically and pervasively impacted residents, and we need to ensure that their needs are prioritized and accounted for, even though they are not often the ones who attend community stakeholder sessions! The risk of *further* displacement is very high - Are there measures El Cerrito can put in place to prevent this cycle of displacement from continuing? As the draft states on page 3-81, "While the availability of more moderate and above-moderate income housing will provide more units to respond to population growth, the development of lower income units throughout the city will be integral to mitigating the displacement of lower- and moderate- income households and households of color as the housing market strengthens." To add environmental stewardship to the discussion, if we account for the overwhelming number of service, home health care, educational sector, and other workers who travel into the El Cerrito every day from far away, we are actively contributing to negative environmental impacts when we fail to build housing that is affordable to households earning below \$100k. I encourage the City to communicate proactively with the newly-formed [Bay Area Housing Finance Authority](#) to leverage their resources, guidance, and oversight.

- While I appreciate the potential and attractiveness of ADUs, it's worth noting that their construction does not necessarily correlate with expansion of affordable housing. Many of my neighbors own ADU and rent their units at market rate to individuals who are majority white and higher-income, further consolidating established patterns of economic and racial homogeneity and hierarchy. There is no reason to expect that new constructions will follow a different trend. Like all other cities in the Bay Area, El Cerrito has a very low housing inventory and exceptionally high competition for home buyers and renters alike; those with high incomes are disproportionately favored in this environment, as they have opportunities in both the rental and housing market, and in the former, have a much greater quantity and range of choices. Those who need housing that correlates with lesser financial resources (be they teachers or custodians) cannot compete within such a distorted and restrictive landscape. ADUs in high-resource neighborhoods are not, therefore, "affordable by design to middle-income households" (page 3-76). Understandably, the City cannot regulate what private homeowners elect to rent their units out for, but it's disingenuous to claim that ADUs are going to remedy a larger structural problem, namely: the lack of public will and private interest to dismantle resource hoarding and opportunity segregation in the Bay Area. SB 9 and lot splits are a similar scenario. Again, I recognize the City's limited capacity in this domain and am bolstered by their intentions, but I am compelled to register a counter-narrative to the deployment of recent legislation and ADU assistance as a means of expanding "affordable housing." For the most part, it just isn't. I encourage the City to reach out to organizations like [Urban Habitat](#) and others who are working on the front lines of anti-displacement and resource redistribution to learn more about their strategies and concepts for a more just and equitable housing landscape.

Rachel Rosekind, Public Comment Letter
El Cerrito Housing Element, Second Revised Draft, July 2023

- Lastly, as a member of the Measure X Community Advisory Board, I highly encourage the City to explore how the [Measure X Housing Fund](#) can help to assist and leverage its affordable housing goals, tenant protections, and anti-displacement initiatives. The fund is explicitly targeted to support households earning less than 50% AMI and persons at risk of homelessness.

Thank you for your consideration.

Warmly,

A handwritten signature in black ink that reads "Rachel Rosekind". The signature is written in a cursive, flowing style.

Rachel Rosekind